

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)

ASHLEY ALBERT, et al. Plaintiffs, v. GLOBAL TEL*LINK CORP., et al. Defendants.	Case No. 8:20-CV-1936-PWG
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**STIPULATED MOTION
TO SET BRIEFING SCHEDULE**

COME NOW Plaintiffs Ashley Albert, Ashley Baxter, Karina Jakeway, and Melinda Jabbie (“Plaintiffs”), together with Defendants Global Tel*Link Corp. (“GTL”), Securus Technologies, LLC (“Securus”), and 3CInteractive Corp. (“3CI”) (collectively, “Defendants”), by undersigned counsel, upon this Court’s Letter Order dated July 27, 2020 (ECF No. 31), the conference conducted October 6, 2020, and pursuant to Local Rules 105.2 and 105.9, to

HEREBY STIPULATE and JOINTLY MOVE for an order adopting the following schedule and other parameters for answering or otherwise responding to the complaint in this action, and for briefing any motions filed pursuant to Federal Rule of Civil Procedure 12.

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1. Amendment of pleadings

Plaintiffs have opted to not amend their complaint prior to the filing of Defendants’ motion(s) to dismiss. Plaintiffs advise without stipulation that they otherwise reserve all rights under Federal Rule of Civil Procedure 15.

2. Schedule and page limits for Rule 12 motions

<u>Event</u>	<u>Filed by</u>	<u>Page limit</u>
• All Defendants' responses to complaint	October 30, 2020	50 pgs. combined
• Plaintiffs' opposition(s) to Rule 12 motions	December 18, 2020	50 pgs. combined
• Defendants' replies	January 22, 2021	30 pgs. combined

As to all briefs, any exhibits shall be highlighted to indicate the most relevant material.

Each party shall endeavor to present its arguments as efficiently as practicable within the limits set forth above.

Dated: October 13, 2020

Respectfully submitted,

BY COUNSEL FOR ALL PARTIES, by express written consent:

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* admitted *pro hac vice*

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SO ORDERED this 14th day of October, 2020.

BY THE COURT:

/s/
Hon. Paul W. Grimm, U.S.D.J.